

EXHIBIT 3

DECLARATION OF SHANE BOULWARE

PURSUANT TO 28 U.S.C. § 1746

I, Shane Boulware, hereby make the following declaration based upon my personal knowledge:

1. I am making this declaration voluntarily. The Commodity Futures Trading Commission or its representatives may use this document in select proceeding relating to the matters described herein, if authorization is granted by me in writing. The Commodity Futures Trading Commission or its representatives must inform me of its use.
2. I am over 21 years of age and I reside in Boston, Massachusetts.
3. In approximately July 2017, I learned through word-of-mouth of a Bitcoin (“BTC”) investment platform by a company called Control-Finance Limited (“Control-Finance”).
4. I became interested in Control-Finance and began to research the company, including the watching of YouTube videos made by promoters and others who had invested Bitcoin with Control-Finance.
5. In approximately July 2017, I visited Control-Finance’s website, which was available at www.control-finance.com (the “Control-Finance Website”). The Control-Finance Website offered guaranteed daily profits of 1.5% to investors who transferred Bitcoin to Control-Finance.

Bitcoin Investments with Control-Finance

A. \$10,000 Bitcoin Investment on August 3, 2017

6. On August 3, 2017, I visited the Control-Finance Website and opened an account. I then opened the deposit webpage of the Control-Finance Website to initiate a deposit. The Control-Finance Website directed me to transfer Bitcoin to the following wallet address:

1Ka58bKiQPpp2Gh7bYeJxwHojb6ZSUxJs7.

7. To make the deposit, I visited the website of Coinbase, a company that facilitates payment transactions in crypto-currency. I used Coinbase to exchange \$10,000 in U.S. dollars (\$9,992.89 net of fees) into the equivalent quantity of Bitcoin, or 3.68634152 at the time. I then transferred the 3.68634152 BTC I purchased from Coinbase into wallet address 1Ka58bKiQPpp2Gh7bYeJxwHojb6ZSUxJs7, as per the instructions on the Control-Finance Website. Attached as Exhibit A is a true and correct screenshot of my August 3, 2017, Coinbase transfer of 3.68634152 BTC into wallet address 1Ka58bKiQPpp2Gh7bYeJxwHojb6ZSUxJs7.
8. At the time that I began investing in Control-Finance, I operated a YouTube channel that provided “fact check” videos for crypto-currency investments. As a result, I kept detailed records of my investments in Control-Finance and created spreadsheets to analyze my performance. Attached as Exhibit B is a true and correct excerpt of the Ledger that I created to track my investments in Control-Finance.
9. As reflected in my Ledger (Exhibit B), my August 3, 2017, \$10,000 BTC investment in Control-Finance appeared to grow in value at a rate of 1.5% each day until September 12, 2017. I was able to withdraw my daily profits by transferring Bitcoin into my own wallet addresses through the Control-Finance Website until September 12, 2017.
10. On September 12, 2017, I was no longer able to view or access or request withdrawals from my Control-Finance account. The red “X” beginning in line 41 of the “Net Amt” column of my Ledger (Exhibit B) reflects my notation that Control-Finance ceased processing my withdrawal requests on September 12, 2017.

B. \$12,000 Bitcoin Investment on August 13, 2017

11. On August 13, 2017, I decided to invest an additional \$12,000 in Bitcoin with Control-Finance. At the time, \$12,000 was equivalent to 2.98811478 BTC. To make my \$12,000 / 2.98811478 BTC investment, I visited the Control-Finance Website and clicked on the “Make deposit” button within the “YOUR ACCOUNT MENU” heading. Upon initiating the deposit, the Control-Finance Website showed a “CONFIRM” webpage that displayed following message:

Please send 2.98811478 BTC to
1PmFqsds581Y7jsDPGbpoaym2W316rzzb

Attached as Exhibit C is a true and correct screenshot of the deposit instructions I received through the Control-Finance Website on August 13, 2017.

12. After receiving the deposit instructions, I used my own wallet address, 1NM3g755tZbJqqXA89kWjctv7M4HVqFiLR, to transfer 2.98811478 BTC to wallet address 1PmFqsds581Y7jsDPGbpoaym2W316rzzb.
13. As seen in Exhibit C, the deposit “CONFIRM” webpage of the Control-Finance Website showed that the “Profit” Control-Finance would pay me on my \$12,000 / 2.98811478 BTC deposit was “1.50% daily.” In addition, the “CONFIRM” webpage showed a “Reinvestment” option, as well as the details of my deposit.
14. My August 13, 2017, principal investment of \$12,000 / 2.98811478 BTC is reflected in line 11 of my Ledger (Exhibit B).
15. As reflected in my Ledger (Exhibit B), my August 13, 2017, principal investment of \$12,000 / 2.98811478 BTC appeared to grow in value at a rate of 1.5% each day until September 12, 2017, when the Control-Finance Website was no longer available.
16. As reflected in line 11 of my Ledger (Exhibit B), on August 13, 2017, Control-Finance paid me a bonus of \$359.85 on my 2.98811478 BTC deposit.

C. \$10,000 Bitcoin Investment on August 15, 2017

17. On August 15, 2017, I decided to invest an additional \$10,000 with Control-Finance. At the time, \$10,000 was equivalent to 2.45136492 BTC. To make my \$10,000 / 2.45136492 BTC investment, I again opened the Control-Finance Website and located the “Make deposit” button. Upon clicking the “Make deposit” button, the “CONFIRM” webpage that appeared reflected a “Profit” of “1.50% daily,” and displayed Control-Finance’s “Reinvestment” offer. Attached as Exhibit D is a true and correct screenshot of the deposit confirmation webpage that displayed on the Control-Finance Website on August 15, 2017.

18. As seen in Exhibit D, when I made my deposit on August 15, 2017, the Control-Finance Website displayed an “Order status” as “Waiting for 3 confirmations.” It also provided the following blockchain “Payment” transaction number:

757387e7d9cd2688928c6b7e6df6285de7b6833c48a988c83e38caa8b7af9134

(“Blockchain Transaction *9134”).

19. To make my August 15, 2017, investment of 2.45136492 BTC, I used my wallet address 1Nnape1PdK7YVDCUL2YZwEhGRhApqTwyJD to transfer 2.45136492 BTC to wallet address 19Qga4KGXWNv8U5sRB5sUwyDx1CGyRZqXn.

20. As reflected in line 13 of my Ledger (Exhibit B), on August 15, 2017, Control-Finance paid me a reward of \$294.16 for making my 2.45136492 BTC deposit.

Reinvestment of Profits

21. As reflected in the line 14 of the “Reinvest\$” column of Exhibit B, on August 16, 2017, I reinvested \$650 of my profits back into Control-Finance. The reinvestment option

allowed me to reinvest my daily profits in Control-Finance rather than withdrawing them by requesting transfers to my own wallet addresses.

Total Investment and VIP Benefits

22. In total, I deposited \$32,000 in Bitcoin with Control-Finance. Attached as Exhibit E is a true and correct screenshot of my “Personal Dashboard” from the Control-Finance Website. The screenshot identifies “My Active Deposit” of \$32,733.18, which includes my \$32,000 in principal investments as well as \$733.18 in profits.

23. Based on the size of my Control-Finance investment, I was considered a “VIP” investor. As a VIP investor, I had access to a “VIP chat” that Control-Finance organized on an invitation basis. The VIP chats included other VIP investors and focused on the Control-Finance program.

Control-Finance Halts Payments and Shuts Down

24. As shown by the red “X” beginning in line 41 of the “Net Amt” column of my Ledger (Exhibit B), on September 12, 2017, Control-Finance suddenly stopped paying me daily profits. In addition, the Control Finance Website disappeared around this time, and I was unable to access or make transactions in my Control-Finance account.

25. On September 15, 2017, Control-Finance Facebook page issued the following post under the “Control-Finance Refund” heading:

Dear Users,

We would like to inform you of the urgent news. Our lawyers received information about the conditions for unlocking all trading accounts of the company. One of them is getting the necessary package of documents and license. This will allow us to restore access to our accounts and conduct our trading activities on the crypto-currency markets completely legally.

Blocking of accounts at the moment and suspension of payments is

considered to be a force majeure situation. In this connection, we are forced to fulfill our obligations to clients.

This will be organized in the form of, payment of the customer's deposit (taking into account already previously paid applications for payment of profit on deposits), i.e. according to the formula: The deposit minus the amount of all applications, for the payment of profits, is equal to the balance for payment. All payments will be made in 45 days and extend until the end of October.

The site will temporarily stop working, but all customer databases with their payment and contact details will be stored on a separate server of the company, this will make all payments to our customers.

Since November, our company will resume its work in a fully legal regime, when all necessary documents will be received and the frozen accounts of the company will be unblocked.

As general director of the company, I ask you to keep your peace of mind and wait for the payment. The first payments were already made on September 11 and will continue, until the end of October. I want to keep my honest name and the name of our company. I will prove that you can trust me and the company.

Attached as Exhibit F is a true and correct screenshot of the September 15, 2017, Facebook post.

26. Control-Finance never resumed payments after September 12, 2017, and the Control-Finance Website never became available to me again.

27. In total, I lost \$21,275.35 of the \$32,000 in Bitcoin that I invested with Control-Finance.

The figure of \$21,275.35 reflects my net losses and accounts for all profit payments I received from Control-Finance before September 12, 2017.

Repayment Hopes and Ambis Ltd

28. After Control-Finance's Facebook post of September 15, 2017 (Exhibit F), I was in frequent communications with other Control-Finance investors through an online chat interface called Telegram, through my YouTube channel, and through other means.

29. Based on my communications with other Control-Finance investors through Telegram, my YouTube channel, and other means, it is my understanding that because of Control-Finance's Facebook post of September 15, 2017 (Exhibit F), Control-Finance investors held out hope until approximately January 2018 that Control-Finance had only temporarily shut down and would eventually repay investors their Bitcoin deposits.
30. At some point after September 15, 2017, a company called Ambis Ltd ("Ambis") surfaced online and offered to pay refunds to Control-Finance investors. Ambis appeared to be affiliated with Control-Finance and used a website and logo that were nearly identical to the Control-Finance Website and logo.
31. I submitted two requests to Ambis for the return of my Control-Finance investment and my profits owed but did not receive any payment or Bitcoin. Attached as Exhibit G are true and correct screenshots of the homepage of the Ambis webpage, my refund requests to Ambis, and the "Channel Info" of a 50-member "Ambis Refund" chat channel that I joined around September 15, 2017.
32. I used the "Ambis Refund" chat channel (Exhibit G at 3) to converse with around 49 other persons who hoped that Ambis would refund their Control-Finance investments.
33. The appearance of Ambis and its offer to refund Control-Finance investors for their losses contributed to the sense of hope that Control-Finance investors would receive the return of their Bitcoin deposits.
34. By around January 2018, I had the impression that the crypto-currency community had generally given up hope that Control-Finance investors would receive the return of their principal deposits or the profit payments they were owed.







I declare under penalty of perjury that the foregoing is true and correct.



Shane A. Boulware

Executed on 30 July 2018 at email
Date Location

EXHIBIT A

 Dashboard  Buy/Sell  Accounts  Send  Tools  Settings



Send Complete

You've successfully sent 3.68634152 BTC (worth \$9,992.89 USD) to 1Ka58bKiQPpp2Gh7bYeJxwHojb6ZSUxJs7.

[Back to Account](#) · [Send Again](#)

EXHIBIT B

Day	Date	Platform	Principal	Payout	Net Amt	Type	Reinvest\$	Bonus?	AdditionalDeposit?	Interest Rate
1	3 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
2	4 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
3	5 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
4	6 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
5	7 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
6	8 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
7	9 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
8	10 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
9	11 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
10	12 Aug 2017	Cntrl-Fin	\$ 10,278.39	CF BTC Wallet	✓ 154.17	USD				1.50%
11	13 Aug 2017	Cntrl-Fin	\$ 22,633.57	CF BTC Wallet	✓ 339.50	USD		\$359.85	\$11,995.33	1.50%
12	14 Aug 2017	Cntrl-Fin	\$ 22,633.57	CF BTC Wallet	✓ 339.50	USD				1.50%
13	15 Aug 2017	Cntrl-Fin	\$ 32,733.18	CF BTC Wallet	✓ 490.99	USD		\$294.16	\$9,805.45	1.50%
14	16 Aug 2017	Cntrl-Fin	\$ 32,733.18	CF BTC Wallet	✓ 490.99	USD	\$650.00			1.50%
15	17 Aug 2017	Cntrl-Fin	\$ 33,383.18	CF BTC Wallet	✓ 500.74	USD				1.50%
16	18 Aug 2017	Cntrl-Fin	\$ 33,383.18	CF BTC Wallet	✓ 500.74	USD				1.50%
17	19 Aug 2017	Cntrl-Fin	\$ 33,383.18	CF BTC Wallet	✓ 500.75	USD				1.50%
18	20 Aug 2017	Cntrl-Fin	\$ 33,383.18	CF BTC Wallet	✓ 500.74	USD				1.50%
19	21 Aug 2017	Cntrl-Fin	\$ 33,383.18	CF BTC Wallet	✓ 500.74	USD			\$250.79	1.50%
20	22 Aug 2017	Cntrl-Fin	\$ 33,633.97	CF BTC Wallet	✓ 504.50	USD				1.50%
21	23 Aug 2017	Cntrl-Fin	\$ 33,633.97	CF BTC Wallet	✓ 504.50	USD	\$3.51		\$6.49	1.50%
22	24 Aug 2017	Cntrl-Fin	\$ 33,643.97	CF BTC Wallet	✓ 504.65	USD				1.50%
23	25 Aug 2017	Cntrl-Fin	\$ 33,643.97	CF BTC Wallet	✓ 504.65	USD				1.50%
24	26 Aug 2017	Cntrl-Fin	\$ 33,643.97	CF BTC Wallet	✓ 504.65	USD				1.50%
25	27 Aug 2017	Cntrl-Fin	\$ 33,643.97	CF BTC Wallet	✓ 504.65	USD				1.50%
26	28 Aug 2017	Cntrl-Fin	\$ 33,643.97	CF BTC Wallet	✓ 504.65	USD				1.50%
27	29 Aug 2017	Cntrl-Fin	\$ 33,643.97	CF BTC Wallet	✓ 504.65	USD				1.50%
28	30 Aug 2017	Cntrl-Fin	\$ 33,643.97	CF BTC Wallet	✓ 504.65	USD				1.50%
29	31 Aug 2017	Cntrl-Fin	\$ 33,643.97	CF BTC Wallet	✓ 504.65	USD				1.50%
30	1 Sep 2017	Cntrl-Fin	\$ 33,643.97	CF BTC Wallet	✓ 504.65	USD				1.50%
31	2 Sep 2017	Cntrl-Fin	\$ 33,664.45	CF BTC Wallet	✓ 504.96	USD	\$20.48			1.50%
32	3 Sep 2017	Cntrl-Fin	\$ 33,684.93	CF BTC Wallet	✓ 504.96	USD				1.50%
33	4 Sep 2017	Cntrl-Fin	\$ 33,684.93	CF BTC Wallet	✓ 504.96	USD				1.50%
34	5 Sep 2017	Cntrl-Fin	\$ 33,684.93	CF BTC Wallet	✓ 504.96	USD				1.50%
35	6 Sep 2017	Cntrl-Fin	\$ 33,684.93	CF BTC Wallet	✓ 504.96	USD				1.50%
36	7 Sep 2017	Cntrl-Fin	\$ 33,684.93	CF BTC Wallet	✓ 504.96	USD				1.50%
37	8 Sep 2017	Cntrl-Fin	\$ 33,684.93	CF BTC Wallet	✓ 504.96	USD				1.50%
38	9 Sep 2017	Cntrl-Fin	\$ 33,684.93	CF BTC Wallet	✓ 504.96	USD				1.50%
39	10 Sep 2017	Cntrl-Fin	\$ 33,684.93	CF BTC Wallet	✓ 504.96	USD	\$26.87			1.50%
40	11 Sep 2017	Cntrl-Fin	\$ 33,711.80	CF BTC Wallet	✓ 505.36	USD				1.50%
41	12 Sep 2017	Cntrl-Fin	\$ 33,711.80	CF BTC Wallet	✗					
42	13 Sep 2017	Cntrl-Fin	\$ 33,711.80	CF BTC Wallet	✗					
43	14 Sep 2017	Cntrl-Fin	\$ 33,711.80	CF BTC Wallet	✗					
44	15 Sep 2017	Cntrl-Fin	\$ 33,711.80	CF BTC Wallet	✗					
45	16 Sep 2017	Cntrl-Fin	\$ 33,711.80	CF BTC Wallet	✗					
46	17 Sep 2017	Cntrl-Fin	\$ 33,711.80	CF BTC Wallet	✗					
47	18 Sep 2017	Cntrl-Fin	\$ 33,711.80	CF BTC Wallet	✗					

EXHIBIT C

Time server:
09:15:18 PM

YOUR ACCOUNT MENU

- Your account ✓
- Make deposit** ✓
- Your deposit ✓
- Withdraw funds ✓
- Transactions ✓
- Withdrawals history ✓
- Exchange ✓
- Partners ✓
- Become an representative ✓
- Promo Materials ✓
- Account settings ✓
- Logout ✓

CONFIRM


Profit:	1.50% daily
Reinvestment:	available
Deposit withdrawal:	no (Deposit included in payments)
Withdrawal of profits:	at any time (Commission 0%)
Debit Amount:	\$12000.00
BTC Debit Amount:	2.98811478

Invoice

Please send 2.98811478 BTC to
[1PmFqsds581Y7jsDPGbpoyam2W316rzzb](#)

Order status: Waiting for payment

CANCEL AND RETURN



Time of actuality of the invoice

14:35

MINUTES SECONDS

Date: Aug 13, 2017

Chat With Us

EXHIBIT D

Time server:
02:07:34 PM

YOUR ACCOUNT MENU

Your account ✓

Make deposit ✓

Your deposit ✓

Withdraw funds ✓

Transactions ✓

Withdrawals history ✓

Exchange ✓

Partners ✓

Become a representative ✓

Promo Materials ✓

Account settings ✓


Logout ✓

CONFIRM

Profit:	1.50% daily
Reinvestment:	available
Deposit withdrawal:	no (Deposit included in payments)
Withdrawal of profits:	at any time (Commission 0%)
Debit Amount:	\$10000.00
BTC Debit Amount:	2.45136492

Invoice

Order status: Waiting for 3 confirmations

Payment:
[757387e7d9cd2688928c6b7e6df6285de7b6833c48a988c83e38caa8b7af9134](#)


(0 confirmations).

CANCEL AND RETURN


Time of actuality of the invoice

11:41

MINUTES SECONDS

Date: Aug 15, 2017

zendesk chat

 Chat with us



Type your message here 

EXHIBIT E


Lanzer (Lanzer)

Email: support@control-finance.com
Skype: [reynoldsbenjamin34](#)

ETH.....\$290.3.....-2.87%
XRP.....\$0.162355.....-4.59%
DASH.....\$200.804.....1.65%
ETC.....!

Time server:
07:48:04 PM













PERSONAL DASHBOARD

MY ACTIVE DEPOSIT

32733.18 \$

YOUR ACCOUNT MENU

- Your account** ☒
- Make deposit ☐
- Your deposit ☐
- Withdraw funds ☐
- Transactions ☐
- Withdrawals history ☐
- Exchange ☐
- Partners ☐
- Become a representative ☐
- Promo Materials ☐

PerfectMoney	Payeer	ADVCash	Bitcoin
 Total earnings 0.00 \$	 Total earnings 0.00 \$	 Total earnings 0.00 \$	 Total earnings 2220.76 \$
 Total withdrawn 0.00 \$	 Total withdrawn 0.00 \$	 Total withdrawn 0.00 \$	 Total withdrawn -2220.76 \$
 Withdrawal pending 0.00 \$	 Withdrawal pending 0.00 \$	 Withdrawal pending 0.00 \$	 Withdrawal pending 0.00 \$



Chat Wi

EXHIBIT F



Control-Finance Refund

Home

Posts

Reviews

Photos

About

Community

Create a Page

Posts



Control-Finance Refund

September 15 · 🌐

Dear Users,

We would like to inform you of the urgent news. Our lawyers received information about the conditions for unlocking all trading accounts of the company. One of them is getting the necessary package of documents and license. This will allow us to restore access to our accounts and conduct our trading activities on the crypto-currency markets completely legally.

Blocking of accounts at the moment and suspension of payments is considered to be a force majeure situation. In this connection, we are forced to fulfill our obligations to clients.

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The site will temporarily stop working, but all customer databases with their payment and contact details will be stored on a separate server of the company, this will make all payments to our customers.

Since November, our company will resume its work in a fully legal regime, when all necessary documents will be received and the frozen accounts of the company will be unblocked.

As general director of the company, I ask you to keep your peace of mind and wait for the payment. The first payments were already made on September 11 and will continue, until the end of October. I want to keep my honest name and the name of our company. I will prove that you can trust me and the company.

Like

Comment

Share



Internet Company

1.0 ★★★★★

Very responsive to messages

Community

See All

Invite your friends to like this Page

15 people like this

20 people follow this

About

See All

Typically replies instantly
Send Message

Internet Company

People Also Like



Control-Finance.com ...
Media/News Company

Like



Ambis Refund Internat...
Internet Company

Like



RunSocal
Recreation & Sports Website

Like

English (US) · Español · Português (Brasil) ·
Français (France) · Deutsch



EXHIBIT G

[HOME](#)[COMPANY](#)[INVESTMENT OFFER](#)[AFFILIATE PROGRAM](#)[GETTING STARTED](#)[MEDIA OFFICE](#)[HELP](#)

HELP

You Are Here: [Home](#) • [HELP](#)

HELP

Control Finance experts are always here to answer your questions. You can ask them any time of the day and receive a prompt response.

Please read the Frequently Asked Questions before contacting Support.

[FAQ PAGE](#)

Contact us

You can consult with representatives in your region.

Address: 17 Marble Street, Manchester, Greater Manchester, England, M2 3AW

Skype:
Telegram <https://t.me/ambis2refund>


Email: admin@ambis.ltd
support@ambis.ltd

Follow Us: [f](#) [t](#)

Send feedback

Shane

[\[REDACTED\]@gmail.com](#)

Hi, I invested \$33,691.32 into Control-Finance. I calculate that I should be refunded \$50,368.20, due to 33 days of interest not paid. So $\$33,691.32 + \$16,676.88 = \$50,368.20$ refunded. 

My proof is <https://youtu.be/twO1zrSsfI4> and <https://youtu.be/meGNI8exS0U?t=4m11s>. My username is the same: Lanzer.

Thank you!

[SEND MESSAGE](#)

